DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
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Silver Spring, MD 20993-0002

April 9, 2015

Quality Electrodynamics, LLC
% Ms. Kathleen Aras
Director, Regulatory and Quality Affairs
700 Beta Drive, Suite 100
MAYFIELD VILLAGE OH 44143

Re: K150331
Trade/Device Name: 18ch T/R Knee Coil
Regulation Number: 21 CFR 892.1000
Regulation Name: Magnetic resonance diagnostic device
Regulatory Class: II
Product Code: MOS
Dated: February 6, 2015
Received: February 10, 2015

Dear Ms. Aras:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638 2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

for

Robert Ochs, Ph.D.
Acting Director
Division of Radiological Health
Office of In Vitro Diagnostics
and Radiological Health
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: January 31, 2017
See PRA Statement below.

510(k) Number *(if known)*
K150331

Device Name
18ch T/R Knee Coil

Indications for Use *(Describe)*
The 18ch T/R Knee Coil is intended for use with GE 3.0T MR systems to produce diagnostic images of the knee that can be interpreted by a trained physician.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) *(Signature)*

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

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510(k) Summary

1. Applicant

Quality Electrodynamics, LLC. (QED)
700 Beta Drive, Suite 100
Mayfield Village, OH 44143

2. Contact

Kathleen Aras
Director, Regulatory and Quality Affairs
(440) 484-2964
kathleen.aras@qualedyn.com

3. Date Prepared

06 February 2015

4. Tradenames

18ch T/R Knee Coil

5. Common name

Coil, magnetic resonance, specialty

6. Model Numbers

QED Model Number: Q7000074

GE Model Number: 5561409-2

This device is manufactured and sold by QED to GE. GE sells the device to end users under their own model number.

7. Classification

Magnetic resonance diagnostic device (21 CFR 892.1000, Product Code MOS, Class II)

8. Predicate Device

TxRx 15Ch Knee Coil 3T, Quality Electrodynamics, LLC., K082636

9. Device Description

The 18ch T/R Knee Coil is a transmit/receive, 18-channel phased array coil designed for magnetic resonance imaging (MRI) using the GE 3T MR systems. The 18ch T/R Knee Coil is intended to be used for imaging the knee.

The 18ch T/R Knee Coil is a reusable, non-invasive device with limited exposure with regard to duration of contact with the body. All coil elements are enclosed in a rigid plastic housing which is fire-rated, has impact and tensile strength, and has been tested for biocompatibility.

The 18ch T/R Knee Coil also includes the accessories listed in Table 1. The accessories consist only of patient comfort pads.

Table 1: 18ch T/R Knee Coil Accessories

QED Part Number	Description	Qty
3003887	18ch T/R Knee Coil Foot Pad	1
3003863	TDI Knee Array 18Ch Thigh Ramp Pad	1
3003896	18ch T/R Knee Coil Calf Pad	1
3003885	18ch T/R Knee Coil Bottom Pad, 0.5”	1
3003884	18ch T/R Knee Coil Bottom Pad, 0.25”	1
3003888	18ch T/R Knee Coil Pad, Non-Imaged Knee	1

10. Indications for Use

The 18ch T/R Knee Coil is intended for use with GE 3.0T MR systems to produce diagnostic images of the knee that can be interpreted by a trained physician.

The Indications for Use statement for the 18ch T/R Knee Coil is not identical to the predicate device; however, the differences do not alter the intended diagnostic use of the device nor do they affect the safety and effectiveness of the device relative to the predicate. Both Indications for Use statements indicate that the device is intended to be used in conjuction with a 3T MR system to produce images of the knee and that the images can be interpreted by a trained physician. The Indications for Use statements differ only in the MR systems the coils are intended to be used with; the predicate is intended to be used with a Siemens MR system while the proposed device is intended to be used with a GE MR system.

11. Summary of Technological Characteristics Compared to the Predicate Device

The proposed 18ch T/R Knee Coil and the predicate TxRx 15Ch Knee Coil 3T are both transmit/receive phased array RF coils intended to be used with a 3T MR system to provide images of the knee.

At a high level, the subject and predicate devices are based on the following same technological elements:

- Transmit/receive phased array RF coils
- Compatible with 3T MR systems
- Active PIN diode switching blocking circuitry. Passive blocking circuitry.
- Split-top mechanical design with an inner cross section shaped to fit the knee and leg
- Polycarbonate housing material

The following technological differences exist between the subject and predicate devices:

- Number of channels (18 (subject) versus 15 (predicate))
- Compatible MR system (3T GE SIGNA Pioneer (subject) versus 3T Siemens Trio/Verio (predicate))
- Surface coating (Sherwin Williams Polane T (subject) versus Sherwin Williams Polane S (predicate))

12. Performance Data

The following performance data were provided in support of the substantial equivalence determination.

Biocompatibility Testing

The only patient contact material on the Atlas SPEEDER Head/Neck is Lexan 940 polycarbonate painted with Polane T polyurethane enamel. Both the polycarbonate and the polyurethane enamel have a history of safe use in MR applications and other medical devices. For example, the Lexan 940 is a patient contact material in devices cleared through 510(k) numbers K072935 and K082636 and the Polane T is a patient contact

material in devices cleared through 510(k) numbers K103327 and K142098.

Electrical Safety and Electromagnetic Compatibility

The 18ch T/R Knee Coil was tested to and found to be compliant with AAMI/ANSI ES60601-1 and IEC 60601-2-33.

Surface heating was tested in accordance with AAMI/ANSI ES60601-1. The measured temperature of the surface of the coil never exceeded the maximum limit of 41^{o}C.

A finite-difference time-domain electromagnetic simulation was performed to provide data supporting that the partial body limits for SAR are controlled within the limits described in IEC 60601-2-33. The simulation showed that the local SAR limits for the 18ch T/R Knee Coil are below the IEC 60601-2-33 partial body limits.

Bench Testing

The SNR and uniformity of the 18ch T/R Knee Coil was analyzed per and found to conform to NEMA MS 1-2008 and NEMA MS 3-2008.

13. Conclusion

The electrical safety and electromagnetic compatibility and biocompatibility data support the safety of the 18ch T/R Knee Coil and the bench testing per the NEMA standards demonstrates the performance and effectiveness of the device under the specified use conditions. This testing demonstrates that the 18ch T/R Knee Coil performs as well as or better than the predicate device.